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11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

14 CHRISTINA T., pseudonymously,
15 Plaintiff,
16 vs.
17 BELLAGIO LLC, et al.,
18 Defendants.

Case No. : 2:25-cv-145

STIPULATION AND ORDER
TO SEAL

19 Plaintiff Christina T. ("Plaintiff") and Defendants Bellagio LLC; Desert Palace LLC;
20 Nevada Property 1 LLC; Mandalay Bay Resort Group LLC; MGM Grand Hotel LLC; MGM
21 Grand Propco LLC; Venetian Las Vegas Gaming, LLC; and Wynn Las Vegas, LLC (collectively
22 "Defendants" and, together with Plaintiff, the "Parties"), by and through their respective counsel
23 of record, hereby agree and stipulate as follows:

24 1. On November 17, 2025, Plaintiff filed a Motion to Amend [53] Amended
25 Complaint with Exhibit 1 [Proposed] Second Amended Complaint. (ECF No. 82.)

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2. Defendants Bellagio LLC, Mandalay Bay Resort Group, LLC, MGM Grand Hotel, LLC, MGM Grand Propco, LLC, Venetian Las Vegas Gaming, LLC, and Wynn Las Vegas, LLC have asserted that Exhibit 1 contains, and/or includes allegations that are based upon confidential information that was disclosed in a separate proceeding, currently pending before the Court as *A.H. v. Wynn Las Vegas, LLC*, Case No. 24-cv-01041-GMN-NJK (the “AH Litigation”), under the protection of a Protective Order entered in the AH Litigation (the “AH Litigation PO”) and that Plaintiff’s counsel obtained through their role as counsel for plaintiff in the AH Litigation. Pursuant to the AH Litigation PO, such material requires protection from public disclosure.

3. The Parties agree, stipulate, and respectfully request that the Court temporarily seal Exhibit 1 [Proposed] Second Amended Complaint attached to Plaintiff’s Motion to Amend filed on November 17, 2025 (ECF No. 82) to provide the parties an opportunity to meet and confer regarding a potential resolution of Defendants’ contentions.

4. Good cause and compelling reasons exist to seal Exhibit 1 on the basis of Defendants’ assertion of violation of the AH Litigation PO in order to remove Exhibit 1 from the public eye while the parties work out this dispute because failure to seal eliminates the parties’ ability to remediate the issue.

5. The parties stipulate and agree that Exhibit 1 should be sealed for sixty (60) days from the date of entry of this Stipulation or the Court’s ruling on a further motion or stipulation from the Parties relating to this issue, whichever is earlier.

IT IS SO STIPULATED.

DATED this 20th day of November, 2025.

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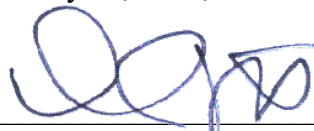
Having reviewed the parties' stipulation, the Court finds compelling reasons to seal the exhibit to the motion to amend for sixty days from the date of this order.

As a preliminary matter, the Court analyzes this stipulation using the compelling reasons standard (rather than the good cause standard) because the exhibit is a proposed amended complaint and therefore, more than tangentially related to the merits of the case. *See Ctr for Auto Safety v. Chrysler Group, LLC*, 809 F.3d 1092, 1097, 1101 (9th Cir. 2016). The Court finds the parties' need for time to discuss Defendants' assertion that the exhibit contains material marked confidential in another case constitutes a compelling reason. *Id.* But only to **temporarily** seal the document. This is because the fact that a party has designated material confidential under a protective order does not, standing alone, establish sufficient grounds to seal a filed document. *See Foltz v. State Farm Mut. Auto. Ins. Co.*, 331 F.3d 1122, 1133 (9th Cir. 2003); *see also Beckman Indus., Inc. v. Int'l Ins. Co.*, 966 F.2d 470, 476 (9th Cir. 1992). So, if a party wishes the Court to keep the exhibit under seal after the sixty days has passed, that party must file a motion to seal that provides compelling reasons beyond just the existence of a protective order.

IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 83) is **GRANTED**.

IT IS FURTHER ORDERED that the Clerk of Court is kindly directed to **SEAL** Exhibit A to the Motion to Amend Complaint (ECF No. 82-1).

IT IS FURTHER ORDERED that the Court will retain this exhibit under seal until **January 20, 2026**. If the Court does not receive a motion or stipulation establishing compelling reasons for retaining the exhibit under seal before January 20, 2026, the Court will **unseal** the document.



DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: November 24, 2025